

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA RECEIVED

CHARLES T. HALL #159264

Full name and prison number
of plaintiff(s)

v.

JEAN HARTZOG

ERKIE HARTZOG

Name of person(s) who violated
your constitutional rights.
(List the names of all the
persons.)

2006 JUN 14 A 9:41

U.S. DISTRICT CLERK
MIDDLE DISTRICT OF ALA

CIVIL ACTION NO. 2:06-cv-527-WHA
(To be supplied by the clerk
of U.S. District Court)

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES() NO(**X**)
- B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES() NO(**X**)
- C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) N/A

Defendant(s) N/A

2. Court (if federal court, name the district; if state court, name the county)

N/A

3. Docket number N/A
4. Name of judge to whom case was assigned N/A
5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) N/A
6. Approximate date of filing lawsuit N/A
7. Approximate date of disposition N/A

II. PLACE OF PRESENT CONFINEMENT DONALSON CORRECTIONAL FACILITY - 100 WARRIOR LN. - BESSEMER, AL. 35023

PLACE OF INSTITUTION WHERE INCIDENT OCCURRED Barbour Co.
Jail - Clayton Alabama

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

NAME	ADDRESS
1. <u>JEAN HARTZOG</u> -	<u>Barbour County Courthouse</u> <u>CLAYTON, AL. - 36016</u>
2. <u>ERGIE HARTZOG</u> -	<u>Clio, AL. 36017</u> <u>BAXTER STATION Rd. COUNTY Hwy. 22</u>
3.	
4.	
5.	
6.	

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED APRIL 1ST, 2004

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: "SEE ATTACHED"

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

"SEE ATTACHED"

GROUND TWO: "SEE ATTACHED"

SUPPORTING FACTS: "SEE ATTACHED"

GROUND THREE: "SEE ATTACHED"

SUPPORTING FACTS: "SEE ATTACHED"

IV.

"ATTACHMENT"
APRIL 1ST, 2004

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU
BASE YOUR ALLEGATION THAT YOUR CONSTITU-
TIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: PLAINTIFF IS BEING DENIED
HIS RIGHT TO A DUE PROCESS HEARING.
THUS BEING DEPRIVED OF A LIBERTY
INTEREST.

PLAINTIFF WAS ASKED TO PROVIDE A URINE
SAMPLE BY OFFICER LARRY MORRIS, WHO
WAS A JAILER AT THE BARBOUR COUNTY
JAIL. PLAINTIFF WAS INCARCERATE THERE
AND ASSIGNED TO THE WORK RELEASE
PROGRAM. PLAINTIFF ALSO WAS A STATE
PRISONER DOING 20 YEAR SENTENCE.
THIS SAMPLE WAS PROVIDED ON OR
ABOUT APRIL 1ST, 2004, AT APPROX. 10:50 PM,
WHEN THE PLAINTIFF WAS RETURNED TO THE
JAIL AFTER WORK. PLAINTIFF WAS TOLD ON
APRIL 2ND, 2004 BY ORLANDO LASSITTER (JAIL)
(ADMINISTRATIVE TRUSTEE) THAT THE PLAINTIFF'S

"ATTACHMENT"

URINE TESTED by JEAN HARTZOG WAS
POSITIVE FOR COCAINE & AMPHEDIMINES.
"SEE PETITIONER'S APPENDIX OF EXHIBITS
(P.A.E.)" EXHIBIT C 1-4; EXHIBIT F & G;
EXHIBIT E-1-7. JEAN HARTZOG WAS WORK-
ING AS JAIL ADMINISTRATOR DURING THE
TIME OF THE INCIDENT.

GROUNDS TWO: PLAINTIFF WAS MADE TO PERFORM
LABOR ON JEAN & ERGIE PERSONAL PROPERTIES
AND EQUIPMENT WITHOUT COMPENSATION FROM
APPROXIMATELY SEPTEMBER 1999 - NOVEMBER
2003. ON MANY OCCASIONS PLAINTIFF WAS
TAKEN FROM THE JAIL BY GEORGE PARHAM
(ASST. JAIL ADMINISTRATOR). JEAN HARTZOG
WOULD TAKE THE PLAINTIFF TO HER PROPERTY
OR WHERE SHE WANTED HIM TO WORK ON
OTHER OCCASIONS. PLEASE SEE THE FOLLOW-
ING EXHIBITS. "EXHIBIT B 1-4" DEFENDANTS
JEAN HARTZOG, AND ERGIE HARTZOG WORKED
THE PLAINTIFF FOR A TOTAL OF 197 HOURS
WITHOUT ANY PAYMENT. THERE WAS ONE CHECK
ISSUED TO THE PLAINTIFF, WHEN THE PLAINTIFF

"ATTACHMENT"

PRUNED DEFENDANT JEAN HARTZOG'S SISTER
ORCHARD, A CHECK FOR \$ 60.00 WAS GIVEN TO
THE PLAINTIFF.

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU.
MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

PLAINTIFF WOULD LIKE TO BE COMPENSATED FOR LOSS OF WAGES
DUE TO THE DENIAL OF A DUE PROCESS. THE LIBERTY INTEREST
IS AMOUNTED TO \$ 90,000.00. PLAINTIFF WOULD LIKEWISE LIKE
TO BE COMPENSATED IN THE AMOUNT OF \$ 1,014.55 FOR WORK DONE
ON JEAN AND ERGIE HARTZOG'S PROPERTY WHICH WAS OBTAINED
BY SLAVE LABOR. FOR A TOTAL OF \$ 91,014.55

X Charles T. Hall
Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true
and correct.

EXECUTED on 6/11/06.
(Date)

Charles T. Hall
Signature of plaintiff(s)